

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**DOROTHY HAYMER,
on behalf of her minor child, D.S.;
*et al.***

PLAINTIFFS

V.

CAUSE NO. 3:17-cv-404-HTW-LGI

**TATE REEVES, in his official capacity as
Governor of Mississippi;
*et al.***

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION

COME NOW the Plaintiffs in the above-styled matter and move the Court for an extension of 30 days in which to submit their Response to the Defendants' Motion to Dismiss [Docket No. 66]. In support of that request, the Plaintiffs would show as follows:

The Defendants filed their Motion to Dismiss on September 14, 2021. The 30-day deadline that the Court scheduled for the Plaintiffs' Response will come due on October 14, 2021.

The Motion to Dismiss poses complex questions of constitutional law that require thoughtful responses. The Plaintiffs have made significant progress toward researching those questions and providing the Court with reasoned arguments, but more work remains to be done before the Plaintiffs can provide the Court with the level of input that the Court and this case deserve.

The Plaintiffs therefore move for a 30-day extension in which to file their Response. This request is made for good cause, and not for reasons of delay,

harassment, or any other dilatory purposes. The Plaintiffs have consulted with the Defendants concerning this request, and the Defendants do not oppose the extension.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs pray that the Court will extend their deadline to respond to the Motion to Dismiss **up to and including Monday, November 15, 2021.**

FURTHERMORE, given the straightforward nature of this request, the Plaintiffs pray that the Court will dispense with the Local Rules' memorandum requirement.

RESPECTFULLY SUBMITTED this Eighth day of October 2021.

/s/ Will Bardwell
Will Bardwell
Attorney for the Plaintiffs

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CERTIFICATE OF SERVICE

I, Will Bardwell, hereby certify that, simultaneous with its filing, a copy of the foregoing *Unopposed Motion for Extension* was served on all counsel of record via the Court's electronic filing system.

SO CERTIFIED this Eighth day of October 2021.

/s/ Will Bardwell
Will Bardwell